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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION BY AND BETWEEN
REORGANIZED DEBTORS AND
PERA SECURITIES CLAIMANTS
REGARDING DISCOVERY AND
CLASS ACTION BRIEFING
SCHEDULE**

[No Hearing Requested]

1 PG&E Corporation and Pacific Gas and Electric Company, as reorganized debtors (the
2 **“Reorganized Debtors”**) in the above-captioned cases (the **“Chapter 11 Cases”**) and the Public
3 Employees Retirement Association of New Mexico (**“PERA”**), along with claimants York County
4 on behalf of the County of York Retirement Fund, City of Warren Police and Fire Retirement
5 System, and Mid-Jersey Trucking Industry & Local No. 701 Pension Fund (**“PERA Securities**
6 **Act Claimants”**), collectively with PERA, the **“PERA Securities Claimants”**, and together with
7 the Reorganized Debtors, the **“Parties”**), by and through their respective counsel, hereby stipulate
8 and agree as follows:

9 RECITALS

10 **WHEREAS**, pursuant to the Court’s *Order Setting Schedule for Pre-Trial and*
11 *Adjudication of Securities Fraud Claims* (Dkt. No. 14643, the “Scheduling Order”), (i) the parties
12 were permitted to begin serving discovery requests on November 21, 2024, (ii) PERA must file
13 its class certification motion, if any, by December 23, 2024, (iii) the Reorganized Debtors must
14 file their opposition to PERA’s class certification motion, if any, by February 6, 2025, (iv) PERA
15 must filed its reply in further support of its class certification motion, if any, by February 27, 2025,
16 and (v) the hearing on PERA’s class certification motion, if any, would be March 11, 2025 at
17 10:00 am;

18 **WHEREAS**, on November 21, 2024, the Reorganized Debtors served the PERA
19 Securities Claimants each with a First Set of Requests for Production and First Set of
20 Interrogatories (the “Reorganized Debtors Discovery Requests”);

21 **WHEREAS**, on November 21, 2024, PERA served the Reorganized Debtors with their
22 First Set of Requests for Production of Documents (the “PERA Document Requests,” and together
23 with the Reorganized Debtors Discovery Requests, the “Parties’ Discovery Requests”);

24 **WHEREAS**, the Parties have agreed to extend the deadline for each of them to respond
25 to the Parties’ Discovery Requests until January 10, 2025;

26 **WHEREAS**, in light of the extension to respond to the Parties’ Discovery Requests, the
27 Parties have conferred regarding an extension to the Scheduling Order with respect to the briefing
28 on class certification;

1 **WHEREAS**, this Stipulation shall have no effect other than what is provided for herein.

2 **NOW, THEREFORE**, the Parties hereby stipulate and agree as follows, subject to
3 approval of the Court:

4 1. The Reorganized Debtors shall have until March 20, 2025 to file an opposition to
5 PERA's class certification motion.

6 2. PERA shall have until April 17, 2025 to file a reply in further support of PERA's
7 class certification motion.

8 3. The Court will set a hearing on PERA's class certification motion for a date that is
9 at the Court's earliest convenience.

10 4. All other deadlines included in the Scheduling Order shall remain in full force and
11 effect.

12 5. This Stipulation shall constitute the entire agreement and understanding of the
13 Parties relating to the subject matter hereof and shall supersede all prior agreements and
14 understandings relating to the subject matter hereof.

15 6. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
16 controversies arising from this Stipulation or any Order approving the terms of this Stipulation.

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1 Dated: December 23, 2024

2 **LATHAM & WATKINS LLP**

3 /s/ Michael J. Reiss

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14 /s/ Willow E. Radcliffe

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